

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

VICTORIA JOHNSON,)	CASE NO. 1:13-CV-2012
)	
Plaintiff,)	JUDGE DONALD NUGENT
)	
v.)	
)	
UNIVERSITY HOSPITALS,)	
)	
Defendant)	

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT AND JURY DEMAND

Now comes the plaintiff, by and through counsel, and moves this Honorable Court for leave to file the attached *Amended Complaint and Jury Demand*. A brief in support of this motion is attached hereto and incorporated herein.

s/Mark P. Herron

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CERTIFICATE OF SERVICE

I certify that on September 13, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Mark P. Herron

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BRIEF IN SUPPORT

Pursuant to Rule 15(A) of the Federal Rules of Civil Procedure, plaintiff respectfully moves this Honorable Court for leave to file the attached *Amended Complaint and Jury Demand*. The sole purpose of this *Amended Complaint and Jury Demand* is to add as a defendant the corporate entity that employed and subsequently unlawfully terminated the plaintiff – University Hospitals Physician Services. No other substantive changes are being made. Defense counsel has previously indicated consent to this amendment in correspondence dated September 4, 2013, where this issue was brought to the undersigned's attention prior to removal of this case to this Court (attached).

Accordingly, and for these reasons, plaintiff respectfully requests leave to file the attached *Amended Complaint and Jury Demand*.

Respectfully Submitted,

s/Mark P. Herron

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